

## **IPT Recommended Hazardous Waste Inspection Approach**

**Operational Instructions:** A hazardous waste (HW) site inspection team will be established to conduct monthly inspections at each initial accumulation point (IAP) and accumulation site (ACCS) on-base. The team will be comprised of all Unit Environmental Coordinators (UEC) on-base. The UECs will organize and schedule the monthly inspections. The monthly inspections do not remove the management and inspection responsibilities of HW managers at IAPs and ACCSs. Inspections will be conducted using EM approved inspection checklists. Checklists prepared will address the most common occurrences of violations at each HW site, including, but not limited to the following:

- a. container labeling
- b. condition of container (no leaks, no spills, no open containers, etc.)
- c. volume/storage limitations
- d. emergency/contingency plans and equipment
- e. inspection checklist/logs
- f. HW profiles (consistent with container HW contents)
- g. container tracking
- h. site/point identification

Each inspecting team, in coordination with the site supervisors, follows each violation to be sure that appropriate on-the-spot corrective actions are taken. The inspection team leader (UEC) files a copy of the completed checklist report with the site HW manager, and forwards to the two-letter director/commander as necessary to reduce repeat findings or achieve prompt final corrective action. Report should indicate findings and any corrective actions taken.

In addition to monthly UEC inspections of each HW container, the following procedures will help ensure continual compliance. EM will continue present continual spot-check inspections, as well as ensure each HW generating organization is inspected quarterly. This will provide the outside eyes and help facilitate crossfeed. Also, the two-letter directors/commanders will make monthly one hour hazardous waste inspections of their organizations patterned after the Center Commander's monthly inspections. The two-letter inspections will be coordinated/arranged by the UEC, and will be conducted monthly. Just as HQ AFMC/CC may ask the Installation Commander about the base's inspection program if an enforcement action is received, so too may the Installation Commander ask the two-letters about their personal involvement if an enforcement action is received.

**Responsibilities:** EM must ensure that implementing instructions for the inspection program are included in the hazardous waste management plan. EM develops the inspection checklists. UECs ensure inspections are conducted, results provided to HW site managers, and two-letter's are scheduled for monthly inspections. Supervisors and HW site managers will ensure corrective actions are taken and violations corrected.

**Controls:** EM conducts spot-checks and reports at EPC if the state of HW compliance indicate monthly inspections are not being completed. EM may ask for completed inspection checklists/reports for EPC Chairman or Installation Commander. UEC reports findings to site supervisor and two-letter director/commander. Monthly inspections by two-letter ensures visible senior leadership attention.